

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
New England  
1 Congress Street, Suite 1100  
Boston, Massachusetts 02114-2023

ATTORNEY/CLIENT PRIVILEGE

MEMORANDUM

shpack  
11.09  
shpack 249711

**DATE :** February 21, 2006

**FROM:** William F. Hanscom, Investigator  
Search & Cost Recovery Section  
Office of Site Remediation & Restoration

**TO :** Barbara O'Toole, Enforcement Coordinator  
Search & Cost Recovery Section  
Office of Site Remediation & Restoration

**SUBJ :** Shpack Remediation Site



SDMS DocID 249711

While working on another assigned site I found the following relative to Swank, Inc.

1983

American Biltrite, Inc. acquired 50 % ownership of K & M Associates, a jewelry supplier.<sup>1</sup>

1995

American Biltrite, Inc., acquired a controlling interest in K & M Associates, a national supplier, distributor and servicer of a wide variety of adult, children's and specialty items of fashion jewelry and related accessories.<sup>2</sup>

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<sup>1</sup> Page No. 694, Mergeant's 2002 Industrial Manual, Volume 1, A - I, Kirstein Library, Boston, Massachusetts.

<sup>2</sup> Page No. 694, Mergeant's 2002 Industrial Manual, Volume 1, A - I, Kirstein Library, Boston, Massachusetts.

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**July 24, 2001**

K & M Associates, a subsidiary of American Biltrite, Inc., acquired certain assets associated with the women's costume jewelry division of Swank, Inc.<sup>3</sup>

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<sup>3</sup> Page No. 694, Mergeant's 2002 Industrial Manual, Volume 1, A - I, Kirstein Library, Boston, Massachusetts.